

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

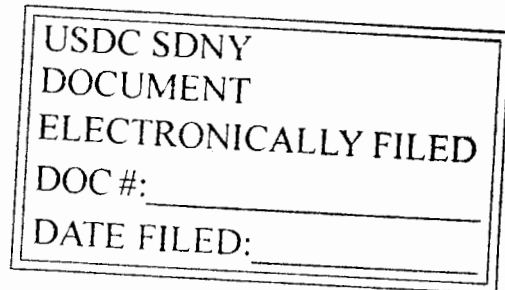
UNITED STATES OF AMERICA

- v. -

MARIA SOLY ALMONTE,  
a/k/a "Soly Almonte,"  
a/k/a "Soly La Fuerte,"  
a/k/a "SoSo,"  
a/k/a "SoSo Wavy,"  
a/k/a "Soly Montana,"  
VETTHYA ALCIUS,  
a/k/a "Theiya Cole,"  
DAWITT DYKES,  
a/k/a "Daweezy,"  
a/k/a "Dawezzy,"  
MARIA MAGDALENA ALMONTE,  
DARLENE DELEON, and  
GABRIELY M. JOSE,  
a/k/a "Gabriela Vuitton,"  
a/k/a "Gabby,"  
  
Defendants.

INDICTMENT

16 CRIM 670



COUNT ONE

(Sex Trafficking Conspiracy)

The Grand Jury charges:

1. In or about 2015, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the

JUDGE NATHAN

defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a) and (b).

2. It was a part and object of the conspiracy that MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b)(2).

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

**(Sex Trafficking of Minor Victim-1)**

The Grand Jury further charges:

3. In or about 2015, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 14 years and would be caused to engage in a commercial sex act, and did aid and abet the same, to wit, MARIA SOLY ALMONTE, ALCIUS, DYKES, and JOSE recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited an individual who was less than 14 years old ("Minor Victim-1"), who was then caused to

engage in at least one commercial sex act that financially benefited MARIA SOLY ALMONTE, ALCIUS, DYKES, and JOSE.

(Title 18, United States Code, Sections 1591(a), (b)(1), and 2.)

**COUNT THREE**

**(Sex Trafficking of Minor Victim-2)**

The Grand Jury further charges:

4. In or about 2015, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did aid and abet the same, to wit, MARIA SOLY ALMONTE, ALCIUS, DYKES, DELEON, and JOSE recruited, enticed, harbored, transported, provided, obtained, advertised, maintained,

patronized, and solicited an individual who was less than 18 years old ("Minor Victim-2"), who was then caused to engage in at least one commercial sex act that financially benefited MARIA SOLY ALMONTE, ALCIUS, DYKES, DELEON, and JOSE.

(Title 18, United States Code, Sections 1591(a), (b)(2), and 2.)

COUNT FOUR

**(Use of Interstate Commerce to Promote Unlawful Activity)**

The Grand Jury further charges:

5. From at least in or about 2014, up to and including in or about June 2016, in the Southern District of New York and elsewhere, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," MARIA MAGDALENA ALMONTE, DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, did use and cause to be used facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit, MARIA SOLY ALMONTE, ALCIUS, DYKES, MARIA MAGDALENA ALMONTE, DELEON, and

JOSE used a cellular phone and the Internet to promote, manage, establish, and carry on a criminal business engaged in sex trafficking and prostitution, and promoting prostitution, in violation of New York Penal Law §§ 230.20 and 230.30.

(Title 18, United States Code, Sections 1952(a)(3) and 2.)

**COUNT FIVE**

**(Enticement of a Minor)**

The Grand Jury further charges:

6. In or about 2015, in the Southern District of New York, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, willfully and knowingly did use a facility and means of interstate or foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be criminally charged under New York Penal Law §§ 230.20 and 230.25, and attempted to do so, to wit, ALCIUS used Facebook to induce a minor to come to a brothel to engage in prostitution.

(Title 18, United States Code, Sections 2422(b) and 2.)

**COUNT SIX**

**(Receipt of Child Pornography)**

The Grand Jury further charges:

7. In or about 2015, in the Southern District of New York and elsewhere, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, knowingly did receive and attempt to receive material



that contains child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, ALCIUS received chat communications over Facebook containing sexually explicit pictures of a child.

(Title 18, United States Code, Section 2252A(a)(2)(B).)

**COUNT SEVEN**

**(Possession of Child Pornography)**

8. In or about 2015, in the Southern District of New York and elsewhere, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit,

ALCIUS possessed images of child pornography in her Facebook account.

(Title 18, United States Code, Sections 2252A(a)(5)(B) and 2.)

**FORFEITURE ALLEGATIONS**

9. As a result of committing one or more of the offenses alleged in Counts One through Three of this Indictment, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One through Three, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One through Three, or any property traceable to such property.

10. As a result of committing the offense alleged in Count Four of this Indictment, MARIA SOLY ALMONTE, a/k/a "Soly Almonte," a/k/a "Soly La Fuerte," a/k/a "SoSo," a/k/a "SoSo Wavy," a/k/a "Soly Montana," VETTHYA ALCIUS, a/k/a "Theiya Cole," DAWITT DYKES, a/k/a "Daweezy," a/k/a "Dawezzy," MARIA



MAGDALENA ALMONTE, DARLENE DELEON, and GABRIELY M. JOSE, a/k/a "Gabriela Vuitton," a/k/a "Gabby," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count Four.

11. As a result of committing the offense alleged in Count Five of this Indictment, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, and any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

12. As a result of committing the offenses alleged in Counts Six and Seven of this Indictment, VETTHYA ALCIUS, a/k/a "Theiya Cole," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said

offenses or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Asset Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or


(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C.

§ 2253(b), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1594 and 2253; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

MARIA SOLY ALMONTE, et al.,

Defendants.

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INDICTMENT

16 Cr.

(18 U.S.C. §§ 1594(c), 1591(a), (b)(1), and (b)(2),  
1952(a)(3), 2422(b), 2252A(a)(2)(B) and 2.)

PREET BHARARA

United States Attorney

Deputy Foreperson

10/6/16 - Filed Indictment  
cc Case assigned to J. Nathan  
Gorenstein  
usmt